



TO: Kim Lundy Service Of Process
Walmart Inc.
702 SW 8TH ST
BENTONVILLE, AR 72716-6209

RE: **Process Served in Texas**

FOR: Wal-Mart Stores, Inc. (Former Name) (Domestic State: DE)
WALMART INC. (True Name)

**Service of Process
Transmittal**

01/06/2021
CT Log Number 538847338

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: Badillo Brenda Lizeth, etc., Pltf. vs. Wal-Mart Stores Inc., etc., Dft.
Name discrepancy noted.

DOCUMENT(S) SERVED: Citation, Return, Petition

COURT/AGENCY: 127th Judicial District Court Harris County, TX
Case # 202083986

NATURE OF ACTION: Personal Injury - Slip/Trip and Fall - 05/21/2020 - 7950 FM 1960 W, Houston, Texas
77070 in Sam's Club #4721

ON WHOM PROCESS WAS SERVED: C T Corporation System, Dallas, TX

DATE AND HOUR OF SERVICE: By Process Server on 01/06/2021 at 02:09

JURISDICTION SERVED : Texas

APPEARANCE OR ANSWER DUE: By 10:00 a.m. on the Monday next following the expiration of 20 days after you
were served (Document(s) may contain additional answer dates)

ATTORNEY(S) / SENDER(S): Annie Shonal Basu
Basu Law Firm, PLLC
P.O. Box 550496
Houston, TX 77255-0496
713-460-2673

ACTION ITEMS: CT has retained the current log, Retain Date: 01/06/2021, Expected Purge Date:
01/11/2021

Image SOP

Email Notification, Kim Lundy Service Of Process ctlawsuits@walmartlegal.com

REGISTERED AGENT ADDRESS: C T Corporation System
1999 Bryan Street
Suite 900
Dallas, TX 75201
877-564-7529
MajorAccountTeam2@wolterskluwer.com

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other

EXHIBIT A



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advisors as necessary. CT disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.



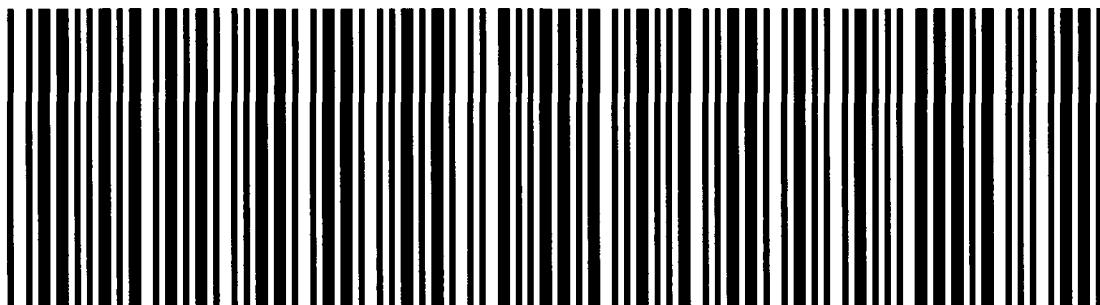
Wolters Kluwer

PROCESS SERVER DELIVERY DETAILS

Date: Wed, Jan 6, 2021

Server Name: Cheryl Albert

Entity Served	WAL-MART STORES INC
Agent Name	
Case Number	202083986
Jurisdiction	TX



Receipt Number: 885067
Tracking Number: 73827407

EML

COPY OF PLEADING PROVIDED BY PLT

CAUSE NUMBER: 202083906

PLAINTIFF: BADILLO, BRENDA LIZETH A/N/F FOR In the 127th Judicial
JENNIFER MARTINEZ

vs. District Court of

DEFENDANT: WAL-MART STORES INC D/B/A SAM'S CLUB Harris County, Texas

CITATION

THE STATE OF TEXAS
County of Harris

TO: WAL-MART STORES INC D/B/A SAM'S CLUB MAY BE
SERVED BY SERVING ITS REGISTERED AGENT
CT CORPORATION SYSTEM
1999 BRYAN ST STE 900
DALLAS TX 75201

Attached is a copy of PLAINTIFF'S ORIGINAL PETITION AND REQUEST FOR DISCLOSURE.
This instrument was filed on December 31, 2020, in the above numbered and styled cause on the docket in the above Judicial District Court of Harris County, Texas, in the courthouse in the City of Houston, Texas. The instrument attached describes the claim against you.

YOU HAVE BEEN SUED. You may employ an attorney. If you or your attorney do not file a written answer with the District Clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you.

ISSUED AND GIVEN UNDER MY HAND and seal of said Court, at Houston, Texas, this December 31, 2020.



Marilyn Burgess

Marilyn Burgess, District Clerk
Harris County, Texas
201 Caroline, Houston, Texas 77002

Generated By: MARIA RODRIGUEZ

Issued at request of:
BASU, ANNIE SHONAI
PO BOX 550496
HOUSTON, TX 77255
713-460-2673

Bar Number: 24047858

Tracking Number: 73827407
EML

CAUSE NUMBER: 202083986

PLAINTIFF: BADILLO, BRENDA LIZETH A/N/F
FOR JENNIFER MARTINEZ

In the 127th

v\$.

Judicial District Court

DEFENDANT: WAL MART STORES INC D/B/A SAM'S
CLUB

of Harris County, Texas

OFFICER/AUTHORIZED PERSON RETURN

Came to hand at _____ o'clock _____. M., on the _____ day of
_____, 20 _____. Executed at (address) _____

in _____ County
at _____ o'clock _____. M., on the _____ day of
_____, 20 _____. by delivering to _____ defendant,

in person, a true copy of this
Citation together with the accompanying _____ copy(ies) of the
Petition
attached thereto and I endorsed on said copy of the Citation the date of delivery.

To certify which I affix my hand officially this _____ day of
_____, 20 _____. FEE: \$ _____

County, Texas

By:

Deputy

Affiant

On this day, _____, known to me to be
the person whose signature
appears on the foregoing return, personally appeared. After being by me duly sworn,
he/she stated that this citation was executed by him/her in the exact manner recited
on the return.

SWORN TO AND SUBSCRIBED BEFORE ME on this _____ of
_____, 20 _____

Notary Public

CAUSE NO. _____

BRENDA LIZETH BADILLO
A/N/F FOR JENNIFER MARTINEZ
Plaintiff

V.

WAL-MART STORES INC.,
D/B/A SAM'S CLUB

Defendant

§ IN THE DISTRICT COURT

§
§
§
§
§
§
§
§
§ JUDICIAL DISTRICT

HARRIS COUNTY, TEXAS

PLAINTIFF'S ORIGINAL PETITION AND REQUESTS FOR DISCLOSURE

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Plaintiff BRENDA LIZETH BADILLO A/N/F FOR JENNIFER MARTINEZ, and files her Original Petition, complaining of Defendant WAL-MART STORES INC., D/B/A SAM'S CLUB for cause of action would respectfully show unto the Court the following:

I. LEVEL

Discovery is intended to be conducted under Level 2 of Texas Rules of Civil Procedure 190.

II. PARTIES

Plaintiff, BRENDA LIZETII BADILLO A/N/F FOR JENNIFER MARTINEZ, is a resident of Houston, Harris County, Texas.

Defendant, WAL-MART STORES INC., D/B/A SAM'S CLUB is a Corporation based in Texas, is organized under the laws of the State of Texas, and service of process on the Defendant may be affected pursuant to section 5.201 and 5.255 of the Texas Business Organizations Code,

by serving its registered agent CT Corporation System, 1999 Bryan St, Ste 900, Dallas, Texas 75201.

III. VENUE

The subject matter in controversy is within the jurisdictional limits of this court.

Plaintiffs seek:

- a. only monetary relief of over \$200,000 and not less than \$1,000,000.00, or less including damages of any kind, penalties, costs, expenses, pre-judgment interest, and attorney fees.

This court has jurisdiction over the parties because Defendant is a Texas resident.

Venue in Harris County is proper in this cause under Section 15.002(a)(1) of the Texas Civil Practice and Remedies Code because all or a substantial part of the events or omissions giving rise to this lawsuit occurred in this county.

IV. FACTS

This suit is brought under and by virtue of the laws of the State of Texas to recover those damages which Plaintiff is justly entitled to receive as compensation for injuries she sustained in an incident that happened on or about May 21, 2020. On that date, Plaintiff, an invitee, slipped and fell on negligently maintained premises at 7950 FM 1960 W, Houston, Texas 77070 in Sam's Club #4721. Plaintiff sought immediate medical treatment. The premises owned by Defendant was negligently maintained. On the date of the incident, the premises were under the custody and control of the Defendant that resulted in severe injuries. The Defendant failed to warn Plaintiff of the dangerous condition and failed to make the dangerous condition safe for Plaintiff prior to her fall.

V. NEGLIGENCE

The occurrence made the basis of this suit and the resulting injuries and damages were proximately caused by the negligence and/or negligence per se of the Defendant, for a variety of acts and omissions, including but not limited to one or more of the following:

1. In failing to properly maintain said premises in a reasonable manner;
2. In failing to properly maintain said premises in a safe manner;
3. In failing to exercise caution;
4. In failing to provide warning; and,
5. In maintaining said premises in a reckless and careless manner.

Each and all of the above acts and/or omissions constituted negligence and each and all were the proximate cause of the following made the basis of this suit and the injuries and damages suffered by the Plaintiff herein.

VI. PREMISES LIABILITY-INVITEES

The occurrence made the basis of this suit and the resulting injuries and damages were caused by the Defendant's failure to properly maintain said premises in a safe manner. Plaintiff would show that:

1. The plaintiff was an invitee;
2. The defendant was a possessor of that premises;
3. A condition on the premises posed an unreasonable risk of harm;
4. The defendants knew or reasonably should have known of the danger;
5. The defendants breached its duty of ordinary care by both:

- a. Failing to adequately warn the plaintiff of the condition, and
 - b. Failing to make the condition reasonably safe; and
6. The defendants' breach proximately caused the plaintiff's injuries.

VII. DAMAGES

At the time of trial of this cause, Plaintiff shall ask the Court to submit the following elements of damage for consideration of what sum of money, if paid now in cash, would fairly and reasonably compensate her for her damages. These injuries and damages, which are a direct, proximate and/or producing result of Defendant's conduct, are as follows: As a result of Defendant's negligence, Plaintiff sustained the following damages:

1. Physical pain and mental anguish, past and future;
2. Medical expenses, past and future;
3. Disfigurement, past and future;
4. Physical impairment, past and future; and
5. Out of pocket expenses.

VIII. JURY TRIAL

Plaintiff respectfully requests a trial by jury.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Plaintiff prays that Defendant be cited to appear and answer and that upon final hearing, Plaintiff, recover judgment against the Defendant for her damages as they may appear at trial hereof, together prejudgment and post-judgment interest, costs of court, and such other relief to which Plaintiff may be entitled.

Respectfully submitted,

BASU LAW FIRM, PLLC

By: /s/ Annie Basu

Annie Basu
TBN: 24047858
Jordan Sloane
TBN:24118537
P.O. Box 550496
Houston, Texas 77255-0496
Tel: (713-460-2673)
Fax: (713-690-1508)
Info@basulaw.com
Attorneys For Plaintiff

REQUESTS FOR DISCLOSURE

Pursuant to the provisions of Tex. R. Civ. P. Rule 190.3, Plaintiff serves upon Defendant, Texas Rule of Civil Procedure 194 Request for Disclosure. You are hereby requested to disclose the information or material described in Rule 194.2(a); 194.2(b); 194.2(c); 194.2(e); 194.2(f) (1), 194.2(f)(2), 194.2(f)(3), 194.2(f)(4)(A), and 194.2(f)(4)(B); 194.2(g); 194.2(h); 194.2(j); 194.2(j),194.2(k) and 194.2 (l) within fifty days of your receipt of this document, by sending your responses to Annie Basu, P. O. Box 550496, Houston, Texas 77255.

/s/Annie Basu

ANNIE BASU